

MINOR SOURCE OPERATING PERMIT OFFICE OF AIR MANAGEMENT

**National Products, Inc.
First Road
Kingsbury, Indiana 46345**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the emission units described in Section A (Source Summary) of this permit.

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

Operation Permit No.: MSOP 091-8898-00113	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

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SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-5.1-3(c)] [326 IAC 2-6.1-4(a)]

The Permittee owns and operates a plant the deals with chemical compounding and packaging of household liquid products.

Authorized Individual: National Products, Inc.
Source Address: First Road, Kingsbury, Indiana 46345
Mailing Address: P.O. Box 1701, LaPorte, Indiana 46350
Phone Number: (219) 393-5536
SIC Code: 7389
County Location: LaPorte
County Status: Maintenance on SO₂
Attainment for all the other criteria pollutants
Source Status: Minor Source Operating Permit
Minor Source, under PSD or Emission Offset Rules;

A.2 Emissions units and Pollution Control Equipment Summary

This plant that deals with chemical compounding and packaging of household liquid products is approved to operate the following emissions units and pollution control devices:

- (a) Plant 1, Section 1 Product Line, which involves Hydrochloric Products compounding/mixing and container filling. This line includes ten (10) mixing tanks, identified PL1MH1 through PL1MH10. This line is capable of packaging 13,000 pounds of products per hour.
- (b) Plant 1, Section 2 Product Line, which involves Hydrochloric Products compounding/mixing and container filling. This line includes three (3) mixing tanks, identified PL1MNH1 through PL1MNH3. This line is capable of packaging 2,000 pounds of products per hour.
- (c) Plant 2, Product Line 8, which involves compounding/mixing and container filling. This line includes one (1) mixing tank, identified PL2M3. This line is capable of packaging 1,460 pounds of products per hour.
- (d) Plant 2, Product Line 9, which involves compounding/mixing and container filling. This line includes one (1) mixing tank, identified PL2M4. This line is capable of packaging 1,755 pounds of products per hour.
- (e) Plant 2, Product Line 10, which involves compounding/mixing and container filling. This line includes two (2) mixing tanks, identified PL2M5 & PL2M6. This line is capable of packaging 1,000 pounds of products per hour.

- (f) Plant 2, Product Line 11, which involves compounding/mixing and container filling. This line includes two (2) mixing tanks, identified PL2M8 & PL2M9. This line is used for packaging non-VOC product.
- (g) Plant 3, Product Line, which involves non- Hydrochloric Products compounding/mixing and container filling. This line includes three (3) mixing tanks, identified PL3M1 through PL3M3. This line is capable of packaging 1,397 pounds of products per hour.
- (h) Various natural gas-fired furnaces, identified as FA through FI, with a total heat input capacity of 0.75 million British Thermal Units per hour (mmBtu/hr).

A.3 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is not a major source, as defined in 326 IAC 2-7-1(22);

SECTION B GENERAL CONSTRUCTION CONDITIONS

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1.1 AND 40 CFR 52.780, WITH CONDITIONS LISTED BELOW.

B.1 Permit No Defense [IC 13]

This permit to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

B.2 Definitions

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, any applicable definitions found in IC 13-11, 326 IAC 1-2, and 326 IAC 2-1.1-1 shall prevail.

B.3 Effective Date of the Permit [IC13-15-5-3]

Pursuant to IC 13-15-5-3, this permit becomes effective upon its issuance.

B.4 Revocation of Permits [326 IAC 2-1.1-9(5)]

Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the Commissioner may revoke this permit if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

B.5 Modification to Permit [326 IAC 2]

Notwithstanding Condition B.6, all requirements and conditions of this construction permit shall remain in effect unless modified in a manner consistent with procedures established for modifications of construction permits pursuant to 326 IAC 2 (Permit Review Rules).

B.6 Minor Source Operating Permit [326 IAC 2-6.1]

This document shall also become a minor source operating permit pursuant to 326 IAC 2-6.1 when, prior to start of operation, the following requirements are met:

- (a) The attached affidavit of construction shall be submitted to the Office of Air Management (OAM), Permit Administration & Development Section, verifying that the emissions units were constructed as proposed in the application. The emissions units covered in the New Source Construction Permit may begin operating on the date the affidavit of construction is postmarked or hand delivered to IDEM.
- (b) If construction is completed in phases; i.e., the entire construction is not done continuously, a separate affidavit must be submitted for each phase of construction. Any permit conditions associated with operation start up dates such as stack testing for New Source Performance Standards (NSPS) shall be applicable to each individual phase.
- (c) The Permittee shall receive an Operation Permit Validation Letter from the Chief of the Permit Administration & Development Section and attach it to this document.
- (d) The operation permit will be subject to annual operating permit fees pursuant to 326 IAC 2-1.1-7(Fees).
- (e) Pursuant to 326 IAC 2-6.1-7, the Permittee shall apply for an operation permit renewal at least ninety (90) days prior to the expiration date established in the validation letter. If IDEM, OAM,, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied. The operation permit issued shall contain as a minimum the conditions in Section C and Section D of this permit.

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

C.1 PSD Minor Source Status [326 IAC 2-2] [40 CFR 52.21]

The total source potential to emit of volatile organic compounds (VOC) is less than 250 tons per year. Therefore the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 will not apply.

C.2 Preventive Maintenance Plan [326 IAC 1-6-3]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each emissions unit:

- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
- (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;
- (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond its control, the PMP cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM, OAM, upon request and shall be subject to review and approval by IDEM, OAM.

C.3 Permit Revision [326 IAC 2-5.1-3(e)(3)] [326 IAC 2-6.1-6]

- (a) The Permittee must comply with the requirements of [326 IAC 2-6.1-6] whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1.

- (c) The Permittee shall notify the OAM within thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

C.4 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)] [326 IAC 2-6.1-5(a)(4)]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, the Permittee shall allow IDEM, OAM, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
 - (b) Have access to and copy, at reasonable times, any records that must be kept under this title or the conditions of this permit or any operating permit revisions;
 - (c) Inspect, at reasonable times, any processes, emissions units (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit or any operating permit revisions;
 - (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
 - (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.
- (1) The Permittee may assert a claim that, in the opinion of the Permittee, information removed or about to be removed from the source by IDEM, OAM, or an authorized representative, contains information that is confidential under IC 5-14-3-4(a). The claim shall be made in writing before or at the time the information is removed from the source. In the event that a claim of confidentiality is so asserted, neither IDEM, OAM, nor an authorized representative, may disclose the information unless and until IDEM, OAM, makes a determination under 326 IAC 17-1-7 through 326 IAC 17-1-9 that the information is not entitled to confidential treatment and that determination becomes final. [IC 5-14-3-4; IC 13-14-11-3; 326 IAC 17-1-7 through 326 IAC 17-1-9]
 - (2) The Permittee, IDEM, OAM, acknowledge that the federal law applies to claims of confidentiality made by the Permittee with regard to information removed or about to be removed from the source by U.S. EPA. [40 CFR Part 2, Subpart B]

C.5 Transfer of Ownership or Operation [326 IAC 2-6.1-6(d)(3)]

Pursuant to [326 IAC 2-6.1-6(d)(3)] :

- (a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAM, Permits Branch, within thirty (30) days of the change.
- (b) The written notification shall be sufficient to transfer the permit to the new owner by an notice-only change pursuant to 326 IAC 2-6.1-6(d)(3).
- (c) IDEM, OAM, shall issue a revised permit.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

C.6 Permit Revocation [326 IAC 2-1-9]

Pursuant to 326 IAC 2-1-9(a)(Revocation of Permits), this permit to construct and operate may be revoked for any of the following causes:

- (a) Violation of any conditions of this permit.
- (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.
- (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.
- (d) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of this article.

C.7 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor in a six (6) hour period.

C.8 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

Testing Requirements

C.9 Performance Testing [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing methods approved by IDEM, OAM.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

- (b) All test reports must be received by IDEM, OAM within forty-five (45) days after the completion of the testing. An extension may be granted by the Commissioner, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

Compliance Monitoring Requirements

C.10 Compliance Monitoring [326 IAC 2-1.1-11]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment, no more than ninety (90) days after receipt of this permit. If due to circumstances beyond its control, this schedule cannot be met, the Permittee may extend the compliance schedule an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date. The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

C.11 Monitoring Methods [326 IAC 3]

Any monitoring or testing performed to meet the applicable requirements of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

C.12 Actions Related to Noncompliance Demonstrated by a Stack Test

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected emissions unit while the corrective actions are being implemented. IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant stack tests.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected emissions unit.

The documents submitted pursuant to this condition do not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

Record Keeping and Reporting Requirements

C.13 Monitoring Data Availability [326 IAC 2-6.1-2] [IC 13-14-1-13]

- (a) With the exception of performance tests conducted in accordance with Section C-Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.
- (b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.
- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.
- (e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.
- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.14 General Record Keeping Requirements [326 IAC 2-6.1-2]

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAM representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Records of required monitoring information shall include, where applicable:
 - (1) The date, place, and time of sampling or measurements;
 - (2) The dates analyses were performed;
 - (3) The company or entity performing the analyses;
 - (4) The analytic techniques or methods used;
 - (5) The results of such analyses; and
 - (6) The operating conditions existing at the time of sampling or measurement.

- (c) Support information shall include, where applicable:
 - (1) Copies of all reports required by this permit;
 - (2) All original strip chart recordings for continuous monitoring instrumentation;
 - (3) All calibration and maintenance records;
 - (4) Records of preventive maintenance shall be sufficient to demonstrate that improper maintenance did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.
- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.15 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

- (a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Quarterly Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported. The Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC2-1.1-1(1).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.
- (d) Unless otherwise specified in this permit, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period. The report does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (e) All instances of deviations as described in Section B- Deviations from Permit Requirements Conditions must be clearly identified in such reports. The Emergency/Deviation Occurrence Report does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

SECTION D.1

EMISSIONS UNIT OPERATION CONDITIONS

- | | |
|-----|---|
| (a) | Plant 1, Section 1 Product Line, which involves Hydrochloric Products compounding/mixing and container filling. This line includes ten (10) mixing tanks, identified PL1MH1 through PL1MH10. This line is capable of packaging 13,000 pounds of products per hour. |
| (b) | Plant 1, Section 2 Product Line, which involves Hydrochloric Products compounding/mixing and container filling. This line includes three (3) mixing tanks, identified PL1MNH1 through PL1MNH3. This line is capable of packaging 2,000 pounds of products per hour. |
| (c) | Plant 2, Product Line 8, which involves compounding/mixing and container filling. This line includes one (1) mixing tank, identified PL2M3. This line is capable of packaging 1,460 pounds of products per hour. |
| (d) | Plant 2, Product Line 9, which involves compounding/mixing and container filling. This line includes one (1) mixing tank, identified PL2M4. This line is capable of packaging 1,755 pounds of products per hour. |
| (e) | Plant 2, Product Line 10, which involves compounding/mixing and container filling. This line includes two (2) mixing tanks, identified PL2M5 & PL2M6. This line is capable of packaging 1,000 pounds of products per hour. |
| (f) | Plant 2, Product Line 11, which involves compounding/mixing and container filling. This line includes two (2) mixing tanks, identified PL2M8 & PL2M9. This line is used for packaging non-VOC product. |
| (g) | Plant 3, Product Line, which involves non- Hydrochloric Products compounding/mixing and container filling. This line includes three (3) mixing tanks, identified PL3M1 through PL3M3. This line is capable of packaging 1,397 pounds of products per hour. |
| (h) | Various natural gas-fired furnaces, identified as FA through FI, with a total heat input capacity of 0.75 million British Thermal Units per hour (mmBtu/hr). |

Emission Limitations and Standards

D.1.1 Volatile Organic Compounds (VOC) [BACT Minor Limitation]

The volatile organic liquid (VOL) compounded and packaged into containers from Plant 3, Product Line shall be limited such that the VOC emissions will not exceed 24 tons per twelve-month period, rolled on a monthly basis. Compliance with this limit will make 326 IAC 8-1-6 not applicable.

D.1.2 Hazardous Air Pollutant (HAP) Emissions

Any change in the chemical compounded and packaged that may increase the single HAP or combined HAPs to 10 tons per year or 25 tons per year or more respectively from the equipment in this application shall require prior approval before such change may occur.

D.1.3 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this emissions unit.

Compliance Determination Requirements

D.1.4 Testing Requirements [326 IAC 2-1.1-11]

The Permittee is not required to test this emissions unit by this permit. However, IDEM may require compliance testing when necessary to determine if the emissions unit is in compliance. If testing is required by IDEM, compliance with the VOC emissions limit specified in Condition D.1.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.1.5 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.1.1 shall be determined using formulation data supplied by the VOL manufacturer. IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

Record Keeping and Reporting Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.1.6 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.1.
 - (1) The amount and VOC content of the chemicals compounded and filled. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (2) A log of the dates of use;
 - (3) The total VOC usage for each month;
 - (4) The weight of VOCs emitted for each compliance period;
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.7 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

**Minor Source Operating Permit
Quarterly Report**

Source Name: National Products, Inc.
Source Address: First Road, Kingsbury, Indiana 46345
Mailing Address: P. O. Box1701, LaPorte, Indiana 46350
Operation Permit: MSOP 091-8898-00113
Facility: Plant 3, Product Line
Parameter: Volatile Organic Compounds
Limit: 24 tons per twelve- month period, rolled on a monthly basis.

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Indiana Department of Environmental Management Office of Air Management

Technical Support Document (TSD) for a Minor Source Operating Permit

Source Background and Description

Source Name:	National Products, Inc.
Source Location:	First Road, Kingsbury, Indiana 46345
County:	Laporte
SIC Code:	7389
Operation Permit No.:	MSOP191-8898-00113
Permit Reviewer:	Aida De Guzman

The Office of Air Management (OAM) has reviewed an application from National Products, Inc. relating to the operation of the plant that deals with chemical compounding and packaging of household liquid products. The plant consists of the following equipment:

- (a) Plant 1, Section 1 Product Line, which involves Hydrochloric Products compounding/mixing and container filling. This line includes ten (10) mixing tanks, identified PL1MH1 through PL1MH10. This line is capable of packaging 13,000 pounds of products per hour.
- (b) Plant 1, Section 2 Product Line, which involves Hydrochloric Products compounding/mixing and container filling. This line includes three (3) mixing tanks, identified PL1MNH1 through PL1MNH3. This line is capable of packaging 2,000 pounds of products per hour.
- (c) Plant 2, Product Line 8, which involves compounding/mixing and container filling. This line includes one (1) mixing tank, identified PL2M3. This line is capable of packaging 1,460 pounds of products per hour.
- (d) Plant 2, Product Line 9, which involves compounding/mixing and container filling. This line includes one (1) mixing tank, identified PL2M4. This line is capable of packaging 1,755 pounds of products per hour.
- (e) Plant 2, Product Line 10, which involves compounding/mixing and container filling. This line includes two (2) mixing tanks, identified PL2M5 & PL2M6. This line is capable of packaging 1,000 pounds of products per hour.
- (f) Plant 2, Product Line 11, which involves compounding/mixing and container filling. This line includes two (2) mixing tanks, identified PL2M8 & PL2M9. This line is used for packaging non-VOC product.
- (g) Plant 3, Product Line, which involves non- Hydrochloric Products compounding/mixing and container filling. This line includes three (3) mixing tanks, identified PL3M1 through PL3M3. This line is capable of packaging 1,397 pounds of products per hour.

- (h) Various natural gas-fired furnaces, identified as FA through FI, with a total heat input capacity of 0.75 million British Thermal Units per hour (mmBtu/hr).

Enforcement Issue

- (a) IDEM is aware that the whole plant has been constructed and operated prior to receipt of the proper permit.
- (b) IDEM is reviewing this matter and will take appropriate action. This proposed permit is intended to satisfy the requirements of the construction permit rules.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
FA	Furnace	24	0.4167	100,000	180
FB	Furnace	14	0.67	25,000	180
FC	Furnace	24	0.67	100,000	180
FD	Furnace	24	0.5	50,000	180
FE	Furnace	24	0.5	50,000	180
FF	Furnace	24	0.833	100,000	180
FG	Furnace	24	0.4167	75,000	180
FH	Furnace	27	0.5	100,000	180
FI	Furnace	16	0.833	100,000	180
Evap	Evaporator	16.5	0.833	600	212

Recommendation

The staff recommends to the Commissioner that the Minor Source Operating Permit be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on August 21, 1997. Series of additional information was received on August 21, 1997, May 22, 1998, November 19, 1998, January 1, and 14, 1999, and April 20, 1999.

Emission Calculations

- (a) Natural Gas Combustion:
See Page 1 of 1 TSD Appendix A for detailed emission calculations.
- (b) Chemical Compounding and Packaging Emissions:

Facility	VOC Emissions (tons/yr)	HAPs Emissions (tons/yr)
Plant 1, Section 1 Product Line (Process Tanks PL1MH1 - PL1MH10): Hydrochloric Product 1 (total throughput = 13,000 lb/hr)	0.83	-
Plant 1, Section 1 (Process Tanks PL1MH1-PL1MH10): Hydrochloric Product 2 (total throughput = 13,000 lb/hr)	7.2	-

Plant 1, Section 2 Product Line (Process Tanks PL1MNH1-PL1MNH3): Hydrochloric Product (total throughput = 2,000 lb/hr)				1.08	-
Plant 2 Product Line 8 (Process Tank PL2M3)				1.6	Styrene - 0.127 Formaldehyde - 0.127 Formaldehyde - 1.3
Plant 2 Product Line 9 (Process Tank PL2M4)				0.65	Formaldehyde - 0.03
Plant 2 Product Line 10 (Process Tanks PL2M5 & PL2M6)				0.22	Glycol Ether - 0.0022
Plant 3 Process Tanks PL3M1-PL3M3: TC(W) Non-Hydrochloric Product				61	-
TOTAL				71.75	Single HAP - 1.46 Combined HAPs - 1.6

Note: See Attachment A, marked Confidential for detailed emission calculations.

Potential To Emit Before Controls

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA.”

Pollutant	Potential To Emit (tons/year)
PM	0.0
PM-10	0.0
SO ₂	00
VOC	72.05
CO	0.28
NO _x	0.3

HAPs	Potential To Emit (tons/year)
Styrene	0.127
Formaldehyde	1.46
Glycol Ether	0.0022
TOTAL	1.6

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29) of volatile organic compounds (VOC) are less than 100 tons per year .Therefore, the source is not subject to the provisions of 326 IAC 2-7.

Or

- (b) The potential to emit (as defined in 326 IAC 2-7-1(29) of any single HAP is less than ten (10) tons per year. Therefore, the source is not subject to the provisions of 326 IAC 2-7.

County Attainment Status

The source is located in LaPorte County.

Pollutant	Status (attainment, maintenance attainment, or unclassifiable; severe, moderate, or marginal nonattainment)
PM-10	attainment
SO ₂	maintenance
NO ₂	attainment
Ozone	attainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO_x) are precursors for the formation of ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. Laporte County has been designated as attainment or unclassifiable for ozone.

Source Status

New Source PSD Definition (based on a limit of 24 tons per year on Plant 3, Product Line):

Pollutant	Emissions (tons/year)
PM	0.0
PM-10	0.0
SO ₂	0.0
VOC	35.08
CO	0.28
NO _x	0.3

- (a) This new source is not a major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not one of the 28 listed source categories.

Federal Rule Applicability

- (a) New Source Performance Standards:

- (1) 40 CFR Part 60, Subpart Kb - Standards of Performance for Volatile Organic Liquid (VOL) Storage Vessels) for which Construction, Reconstruction, or Modification commenced after July 23, 1984 applies to each storage vessel, with a capacity greater than 40 m³ (10,567 gallons).

Tanks PL1MH1 through PL1MH10; tanks PL1MNH1 through PL1MNH3; tanks PL2M1 through PL2M9; and tanks PL3M1 through PL3M3 are not subject to this NSPS because they are process tanks and not storage tanks.

- (2) There are no other New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source.

- (b) There are no National Emissions Standards for Hazardous Air Pollutants (NESHAP) applicable to this source.

State Rule Applicability -

- (a) 326 IAC 2-6 (Emission Reporting)
This source is located in LaPorte County, which is not one of the listed counties for this rule. Additionally, the source does not have the potential to emit CO, VOC, NO_x, PM-10, or SO₂ at greater than a 100 ton per year rate. Therefore, 326 IAC 2-6 does not apply.
- (b) 326 IAC 5-1 (Visible Emissions Limitations)
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:
 - (1) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
 - (2) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.
- (c) 326 IAC 8-1-6 (General Reduction Requirements)
Plant 3, Product Line, which manufactures non-hydrochloric products is subject to this rule, because its VOC potential emissions of 61 tons per year are greater than 25 tons per year. The source however, requested a limit of 24 tons per year. Therefore, 326 IAC 8-1-6 would not apply in this case.
- (d) 326 IAC 8 (Volatile Organic Sources)
There are no other provisions in article 326 IAC 8 that would apply to this source.
- (e) 326 IAC 6-2 (PM Emission Limitation for Indirect Heating Facilities)
The various natural gas-fired heaters are not subject to this rule, because they are not sources of indirect heating.

Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of the 188 hazardous air pollutants (HAPs) set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) Part 70 Application Form GSD-08.

This source will emit levels of air toxics less than those which constitute a major source according to Section 112 of the 1990 Clean Air Act Amendments.

See Attachment A, marked Confidential for detail emission calculations.

The operation of this chemical compounding and packaging plant shall be subject to the conditions of the attached proposed **Minor Source Operating Permit MSOP No. 091-8898-00113**.

**Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Small Industrial Boiler**

Page 1 of 1 TSD App A

Company Name: National Products, Inc.
Address: City First Road, Kingsbury, IN 46345
MSOP: 091-8898
Pit ID: 091-00113
Reviewer: Aida De Guzman
Date: April 1, 1999

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

.75

6.6

Pollutant						
Emission Factor in lb/MMCF	PM 7.6	PM10 7.6	SO2 0.6	NOx 100.0 *see below	VOC 5.5	CO 84.0
Potential Emission in tons/yr	0.0	0.0	0.0	0.3	0.0	0.28

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

PM emission factors are condensable and filterable.

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

**Appendix A: Emissions Calculations
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Page 1 of 1 TSD App A

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Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

.75

6.6

Pollutant						
Emission Factor in lb/MMCF	PM 7.6	PM10 7.6	SO2 0.6	NOx 100.0 *see below	VOC 5.5	CO 84.0
Potential Emission in tons/yr	0.0	0.0	0.0	0.3	0.0	0.28

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

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Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton